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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**United States of America, *ex rel.*,  
Samantha Gates, Curtis Moore, and  
Vanessa Pawlak,**

*Plaintiffs,*

vs.

**Centria Healthcare, Et. Al.**

*Defendants.*

Case No.: 4:19-cv-10941-SDD-DRG  
(D. Ct. Judge, Hon. Stephanie Dawkins -Davis)  
(Magistrate, Hon. David R. Grand)

**Stipulation to Extend Defendants' Time  
to Answer, Move, or Otherwise  
Respond to the Complaint, and  
Proposed Order**

**STIPULATION TO EXTEND DEFENDANTS' TIME TO ANSWER, MOVE, OR OTHERWISE  
RESPOND TO THE COMPLAINT, AND PROPOSED ORDER**

**WHEREAS**, on March 29, 2019, Plaintiffs/Relators filed a complaint under seal, pursuant to 31 U.S.C. § 3730(b)(2) (Dkt. No., 1) ("**Complaint**"); and

**WHEREAS**, on December 9, 2019, Plaintiff, the United States of America, filed a Notice of Election to Decline Intervention, through Assistant United States Attorney, Jonny Zajac (Dkt. No., 8); and

**WHEREAS**, on December 30, 2019, the Honorable District Judge, Sean F. Cox, issued an order unsealing the Complaint (Dkt. No., 9); and

**WHEREAS**, on February 3, 2020, counsel for Defendants returned to Plaintiffs/Relators' counsel, signed waivers of summons/service, accepting service on behalf of all Defendants;

**IT IS HEREBY STIPULATED** by and between the parties hereto through their respective attorneys, that Defendants, Centria Healthcare, Scott Barry, Alicia Kidwell, Kyle Kidwell, Richard Loewenstein, Steven Merahn, M.D., Mark Mitchell, Michelle Carter Pierce, Darren Schwartz, Jeffrey Steigerwald, and Chris Wilcox, will have additional time within which to answer, move, or otherwise respond to Plaintiff/Relators' Complaint.

Therefore, the last day for Defendants to answer, move or otherwise respond to Plaintiffs/Relators' Complaint is **Wednesday, April 1, 2020**.

**Dated:** February 5, 2020

**THE HEALTH LAW PARTNERS, P.C.**

/s/ Abby Pendleton

Abby Pendleton, Attorney for Defendants  
Centria Healthcare, Scott Barry, Alicia  
Kidwell, Kyle Kidwell, Richard  
Loewenstein, Steven Merahn, M.D., Mark  
Mitchell, Michelle Carter Pierce, Darren  
Schwartz, Jeffrey Steigerwald, and  
Chris Wilcox

**Dated:** February 5, 2020

**BROWN, LLC**

/s/ Jason Brown

Jason T. Brown, Attorney for  
Plaintiffs/Relators United States of  
America ex rel., Samantha Gates, Curtis  
Moore and Vanessa Pawlak

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants shall answer, move, or otherwise respond to Plaintiffs/Relators complaint on or before Wednesday, April 1, 2020.

**IT IS SO ORDERED.**

**DATED:** \_\_\_\_\_, 2020

\_\_\_\_\_  
Honorable Stephanie Dawkins -Davis  
United States District Court Judge

**PROOF OF SERVICE**

**STATE OF MICHIGAN, COUNTY OF OAKLAND**

At the time of service, I was over 18 and **not a party to this action**. I am employed in the County of Oakland, State of Michigan. My business address is 32000 Northwestern Highway, Suite 240, Farmington Hills, Michigan, 48334.

On February 5, 2020, I served true copies of the foregoing document(s) described as **Stipulation to Extend Defendants' Time to Answer, Move, or Otherwise Respond to the Complaint, and Proposed Order**

on the interested parties:

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**CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in

the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on February 5, 2020, at Farmington Hills, Michigan.

/s/ Abby Pendleton

Abby Pendleton